

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

**VIRNETX INC., and
LEIDOS, INC.,**

Plaintiffs,

v.

APPLE INC.,

Defendant.

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No. 6:12-cv-00855-RWS

JURY TRIAL DEMANDED

DECLARATION OF MICHAEL BOYD

I, Michael Boyd, Director, Treasury Operations of Apple Inc. (“the Company”), do hereby certify as follows:

1. The Company has the financial wherewithal to satisfy the Judgment due to Plaintiffs (including all pre-judgment and post-judgment interest) in the case currently captioned *VirnetX Inc. et al. v. Apple Inc.*, Eastern District of Texas, Civil Action No. 6:12-cv-00855-RWS.

2. Apple will pay, by wire transfer to an account specified in writing by VirnetX, any payments then due under the Judgment within 21 days of the Federal Circuit’s mandate issuing from any appeal from the Judgment in this matter, or, if no appeal is taken, within 21 days of the expiration of the time for initiating such appeal.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this ____ day of January 2021, at Cupertino, California.
